Applicant: Dieter Sauer Attorney's Docket No.: 08215-587US1 / CEA-026566

Serial No.: 10/538,775 Filed: January 4, 2006

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Claim Rejections – 35 U.S.C. §102

Claims 2-14 have been rejected as being anticipated by U.S. Patent No. 3,850,495 (Grover). Applicant requests withdrawal of this rejection because Grover fails to describe or suggest at least a first insert configured for plug coding and engaging and counter engaging elements that can engage in various rotational positions, as recited in claim 2.

Grover relates to a high voltage connector including a receptacle 2 and a socket connector portion 6 that mates with the receptacle 2. See Grover at col. 2, lines 5-19 and Figs. 1 and 4. The receptacle, which is secured in a bulkhead 1, includes internal contacts 13 that mate with pins 29 of the socket connector portion 6. See Grover at col. 2, lines 15-27 and Figs. 1-4. The socket connector portion 6 includes depressions 14 that mate with flanges 12 of the receptacle 2 to provide "proper polarization." See Grover at col. 2, lines 20-27 and Figs. 2 and 3. However, there is no description or suggestion that either the portion 6 or the receptacle 2 are configured for plug coding or that the connector includes engaging and counter engaging elements that can engage in various rotational positions. Rather, as evident from Figs. 2 and 3 of Grover, the depressions 14 mate with the flanges 12 in a single rotation position to enable proper polarization.

The Examiner points to a threaded portion 35 of Grover to somehow show engaging and counter engaging elements that can engage in various rotational positions. Grover explains that the threaded portion 35 enables the back cap 21' (which the Examiner appears to equate with the recited first insert) to be screwed onto the shell 3' (which the Examiner appears to equate with the recited positioning element). See Grover at col. 2, line 65 to col. 3, line 20 and Fig. 4. However, there is no description or suggestion in Grover that the back cap 21' is configured for plug coding, which is a feature related to the first insert, as recited in claim 2. Thus, because the back cap 21' is not configured for plug coding, the back cap 21' cannot correspond to the recited first insert.

Accordingly, for at least these reasons, claim 2 is allowable over Grover. Claims 3-14 depend from claim 2, and are allowable for at least the reasons that claim 2 is allowable and for

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containing allowable subject matter in their own right. For example, claim 6 recites that the first insert exhibits a number of engaging elements that can be brought into engagement with corresponding counter engaging elements in an interior of the first part in the different rotational positions. However, Grover does not describe or suggest such a first insert. The Examiner points to the back cap 21' to somehow correspond to the first insert; however, as discussed above, the back cap 21' is not configured for plug coding and therefore cannot correspond to the recited first insert. Moreover, the back cap 21' does not exhibit a number of engaging elements that can be brought into engagement with corresponding counter engaging element in an interior of the socket connector portion 6 (which the Examiner equates with the recited first part).

Rather, the back cap 21' is a threaded region, and therefore it includes at most, a single engaging element.

Conclusion

In conclusion, applicant submits that all claims are in condition for allowance. It is believed that no fee is due in connection with this filing. Nevertheless, please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

Reg. No. 45,653

Date: March 15, 2007 / Diana DiBerardino / Diana DiBerardino

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